

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUE ZHANG,

Plaintiff,

v.

SHRAGA N. GOLDBERG, M.D.,
Defendants.

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) C.A. NO. 04-12735PBS
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**MOTION OF THE DEFENDANT, SHRAGA N. GOLDBERG, M.D.,
TO EXTEND THE DISCOVERY DEADLINE 60 DAYS
*ASSENTED-TO BY THE PLAINTIFF***

The Defendant, Shraga N. Goldberg (“Dr. Goldberg”), respectfully requests that this Court extend the deadline in which discovery in the referenced matter is to be completed 60 days from March 30, 2006 until **May 30, 2006**, to which the plaintiff assents. In support thereof, the defendant states the following:

1. This is the first request for a short discovery extension.
2. The extension is necessary to conduct the deposition of Dr. Goldberg as defense counsel is on trial and/or out-of-state through March 2006 and is unable to represent him at his deposition until after the expiration of the deadline.
3. The Trial in this case is not set until September 25, 2006.
4. The **plaintiff’s counsel has assented to** this motion.

Wherefore, the parties request that the discovery deadline and other related deadlines be extended 60 days.

The Defendant,
SHRAGA N. GOLDBERG, M.D.,
By his attorney,

The Plaintiff,
JUE ZHANG,
By her Attorneys,

/s/ Jennifer Boyd Herlihy
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